

STATEMENT OF BASIS (AI No. 12096)
PER20050002

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0080888** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Westway Terminal Company, Inc.
Port Allen Terminal
Post Office Box 147
Port Allen, Louisiana 70767

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: February 17, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LWDPS permit - (WP1838) LWDPS permit effective date: January 31, 1993
LWDPS permit expiration date: January 30, 1998

D. LPDES permit – LPDES permit effective date: February 1, 2001
LPDES permit expiration date: January 31, 2006
This permit was modified on October 9, 2001

E. This facility is also covered under LAG670048 for Hydrostatic Test Wastewater. Authorization was first issued to this facility on September 20, 2000. Authorization under the reissued permit of February 1, 2003 was extended to this facility February 19, 2003. The Hydrostatic Test Wastewater General Permit is adequate to cover the discharges of hydrostatic test water from this facility based on the commodities listed in Appendix A.

F. Date Application Received: August 18, 2005, additional information received via email February 8, 2006 and February 14, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - bulk liquids storage facility

This is an existing for hire bulk liquid storage terminal for molasses and other chemicals. There is no chemical processing on site. Facility operations consist of loading and

unloading of ships, barges, railcars and tanker trucks with customer's chemical products. Transfers from vessel, barge, or rail car to the storage tanks are conducted in the open. Hoses/piping are connected from the vessel, barge, or railcar to permanent facility piping, thus to the tanks. These areas are not covered. See Appendix A for a list of products stored/handled at the facility.

Food grade tankers are filled with fructose on site. The fructose trans-loading area is partially covered. The railcars being transferred from are not covered, but the tanker trucks being transferred into are covered. Prior to filling, these tanks are rinsed with hot water. No soaps or detergents are used. Approximately 6-10 trucks are washed per day. The truck wash area is operated 240 days per year. Washing operations take place under cover.

Discharges from the facility include treated sanitary wastewater, internal and external truck washwater, boiler blowdown, area washdown, and stormwater runoff.

This facility is subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, Subpart D, because, in accordance with 40 CFR 442.40, "This subpart applies to discharges resulting from cleaning of tank trucks, intermodal tank containers, rail tank cars, tank barges and ocean/sea tankers which have been used to transport food grade cargos." This facility cleans tank trucks used to transport fructose. Definitions established at 40 CFR 442 for food grade cargos and tank trucks have been included in "Other Conditions" of the draft permit.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4226

C. LOCATION - 1650 Ernest D Wilson Drive, in Port Allen, West Baton Rouge Parish
Latitude 30°26'18", Longitude 91°12'13"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type:	stormwater runoff from the northeast area of the facility, treated sanitary wastewater (100gpd), and boiler blowdown (20-25 gallons per week)
Treatment:	septic system for the sanitary
Location:	at the point of discharge from the storm drain near the northeast corner of the boiler building (Latitude 30°26'19", Longitude 91°12'11")
Flow:	intermittent
Discharge Route:	unnamed ditches to the Intracoastal Waterway

Outfall 002

Discharge Type: stormwater runoff from the west area of the site
Treatment: none
Location: at the point of discharge from the ditch at the northwest corner of the site (Latitude 30°26'20", Longitude 91°12'19")
Flow: intermittent
Discharge Route: unnamed ditches to the Intracoastal Waterway

Outfall 003

Discharge Type: stormwater runoff from the southwest area of the site, near the rail yards
Treatment: none
Location: at the point of discharge from the storm drain near the west property line south of the rail spur (Latitude 30°26'17", Longitude 91°12'19")
Flow: intermittent
Discharge Route: unnamed ditches to the Intracoastal Waterway

Outfall 004

Discharge Type: stormwater runoff from the south area of the site, including the Fructose Trans-Loading Facility and the maintenance area, treated sanitary wastewater (50gpd), and previously monitored external and internal truck washwater and area washdown
Treatment: septic system for the sanitary
Location: approximately 100 feet south of the fructose tanker truck washout building (Latitude 30°26'15", Longitude 91°12'14")
Flow: intermittent
Discharge Route: unnamed ditches to the Intracoastal Waterway

Outfall 104

Discharge Type: internal and external truck washwater and area washdown
Treatment: none
Location: at the point of discharge from the catch basin in the fructose tanker truck washout building before combining with Outfall 004
Flow: (5,400 gpd) (240 days/year) = 1,296,000 gallons per year
Discharge Route: unnamed ditches to the Intracoastal Waterway

4. RECEIVING WATERS

STREAM – the Intracoastal Waterway via unnamed ditches

BASIN AND SEGMENT - Terrebonne Basin, Segment 120109

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. PROPOSED EFFLUENT LIMITS

A. BASIS - See Rationale Page 9

1. Changes from the previous permit:

- a) Outfall 003 no longer includes treated sanitary wastewater and area washdown. These discharges have been rerouted to Outfall 004; therefore, the Fecal Coliform parameter has been removed from this outfall. However, due to excessive exceedances at Outfall 003, a report requirement for BOD₅ will remain in the permit for this outfall based on BPJ.
- b) Previous Outfall 004, the discharge of internal and external vehicle washwater and area washdown, is now internal Outfall 104. This discharge is subject to the Transportation Equipment Cleaning guidelines found at 40 CFR 442, Subpart D. In accordance with 40 CFR 442.41, daily maximum and monthly average limits for BOD₅, TSS, and Oil and Grease have been included in the effluent limitations for Outfall 104.
- c) Outfall 004 now consists of the discharge of stormwater runoff from the south area of the site; including the Fructose Trans-Loading Facility and the maintenance area, treated sanitary wastewater, and previously monitored external and internal truck washwater and area washdown. Therefore, sanitary and stormwater parameters have been added to this outfall.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

1. WQMD - An inspection conducted November 18, 2002 revealed the following:

- a) permittee has not submitted DMRs since the 1st quarter of 2001.
- b) Facility does not match permit as per modification dated 10/17/01. Outfall 003 includes parameters for STP - there is no STP associated with this outfall. Outfall 004 does not have parameters for a STP, however, there is an inground STP that goes to Outfall 004.
- c) The discharge from the STP at Outfall 001 goes to the ground and combines with stormwater runoff during rain events. If there is no rain, there is "no flow" at Outfall 001 and the STP will not be sampled.
- d) Outfalls 001 and 004 do not have sample collection points that allow for free flow, discrete sampling
- e) STP at 004 had no chlorine tablets
- f) permittee has not sampled since 1st quarter 2001

2. Other Divisions -

Air Compliance Order # AE-CN-05-0082 was issued to the facility August 15, 2005 for storing materials other than those specified in their permit. A modification request was approved September 10, 2005.

B. DMR Review/Excursions – DMRs were reviewed for the period September, 2003 through June, 2005. Permit excursions are listed below.

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
3 rd ¼ 2003	BOD ₅	003	241 mg/l	45 mg/l
	TOC	003	180 mg/l	50 mg/l
	Fecal Coliform	003	>2000 col/100ml	400 col/100ml
	Temperature	004	110°F	100°F
4 th ¼ 2003	Fecal Coliform	001	> 2000 col/100ml	400 col/100ml
	BOD ₅	003	336 mg/l	45 mg/l
	TOC	003	165 mg/l	50 mg/l
	Fecal Coliform	003	> 2000 col/100ml	400 col/100ml
1 st ¼ 2004	Fecal Coliform	001	920 col/100ml	400 col/100ml
	BOD ₅	003	232 mg/l	45 mg/l
	TOC	003	141 mg/l	50 mg/l
	Fecal Coliform	001	> 2000 col/100ml	400 col/100 ml
2 nd ¼ 2004	TOC	003	343 mg/l	50 mg/l
	BOD ₅	003	413 mg/l	45 mg/l
	Fecal Coliform	003	2000 col/100ml	400 col/100 ml
	Temperature	004	140°F	100°F

7. EXISTING EFFLUENT LIMITS

Outfall 001, the intermittent discharge of uncontaminated stormwater runoff from the northeast area of the site, boiler blowdown, and treated sanitary wastewater

<i>Pollutants</i>	<i>Daily Average (mg/l) Unless Stated</i>	<i>Daily Maximum (mg/l) Unless Stated</i>	<i>Monitoring Frequency</i>
Flow - gpd	Report	Report	1/quarter
TOC	---	50	1/quarter
Oil and Grease	--	15	1/quarter
BOD ₅	---	45	1/quarter
Fecal Coliform colonies/100 ml	---	400	1/quarter
Ph - standard units	6.0 (min)	9.0 (max)	1/quarter

Outfall 002, the intermittent discharge of uncontaminated stormwater runoff from the west area of the site

<i>Pollutant</i>	<i>Monthly Average (mg/l) Unless Stated</i>	<i>Weekly Maximum (mg/l) Unless Stated</i>	<i>Monitoring Frequency</i>
Flow - GPD	---	Report	1/quarter
TOC	---	50	1/quarter
Oil and Grease	---	15	1/quarter
pH Min./Max. Standard Units	6.0 (min.)	9.0 (max.)	1/quarter

Outfall 003, the discharge of stormwater runoff, previously treated sanitary wastewater, and area washdown (flow is intermittent)

<i>Pollutant</i>	<i>Monthly Average (mg/l) Unless Stated</i>	<i>Weekly Average (mg/l) Unless Stated</i>	<i>Monitoring Frequency</i>
Flow - GPD	Report	Report	1/quarter
TOC	---	50	1/quarter
BOD ₅	---	45	1/quarter
Fecal Coliform Colonies/100 ml	---	400	1/quarter
Oil and Grease		15	1/quarter
pH Min./Max. Standard Units	6.0 (min.)	9.0 (max.)	1/quarter

Outfall 004, the discharge of external and internal truck washwater and area washdown (flow is intermittent)

<i>Pollutant</i>	<i>Monthly Average (mg/l) Unless Stated</i>	<i>Weekly Average (mg/l) Unless Stated</i>	<i>Monitoring Frequency</i>
Flow - GPD	Report	Report	1/quarter
TSS	---	45	1/quarter
Temperature, °F	---	100°F	1/quarter
Oil and Grease	---	15	1/quarter
Visible Sheen	No presence	---	1/day
pH Min./Max. Standard Units	6.0 (min.)	9.0 (max.)	1/quarter

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120109 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. 303(d)/TMDL

Subsegment 120109, Intracoastal Waterway – Morgan City to Port Allen Route – Port Allen Locks to Bayou Sorrel Locks is listed on LDEQ's Final 2004 303(d) List as impaired for nutrients (EPA – Category 5), organic enrichment/low dissolved oxygen (DO) (EPA – Category 5), and pathogen indicators (due to on-site treatment systems). To date, no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Terrebonne Basin, those suspected causes for impairment which are not directly attributed to the discharges from bulk storage facilities have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Fecal Coliform

The discharge of treated sanitary wastewater from Westway Terminal Company, Inc.'s Port Allen Terminal has the potential to discharge pollutants associated with the pathogen indicators impairment. This will be addressed through the Fecal Coliform parameter.

Organic Enrichment/Low Dissolved Oxygen

Potential organic enrichment/low dissolved oxygen impairments due to the sanitary wastewater, area washdown, and vehicle washwater discharges shall be addressed through the BOD parameter. The discharge of stormwater runoff from this facility also has the potential to

contribute to the organic enrichment/low dissolved oxygen impairments of the receiving waterbody. This will be addressed through the TOC parameter and the Stormwater Pollution Prevention Plan.

Nutrients

The discharge of treated sanitary wastewater has the potential to discharge pollutants associated with the nutrient impairment. LDEQ's position, as stated in the declaratory ruling issued by Dale Givens regarding water quality criteria for nutrients (Sierra Club v. Givens, 710 So. 2d 249 (La. App. 1st Cir. 1997) m writ denied, 705 So. 2d 1106 (La. 1998)), is that when oxygen demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. Dissolved oxygen will be controlled by the BOD limit.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

13. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2341.B.14.k, stormwater discharges from facilities classified as SIC Code 4226 are considered to be associated with industrial activities if the facility has maintenance shops, equipment cleaning operations, or airport deicing operations on site. This facility has discharges from equipment cleaning. Therefore, an SWP3 is included in the permit.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements for the AI).

Rationale for Westway Terminal Company, Inc.

1. **Outfall 001** – the intermittent discharge of stormwater runoff from the northeast area of the facility, treated sanitary wastewater, and boiler blowdown

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow – MGD	Report : Report	LAC 33:IX.2707.I.1.b
TOC	--- : 50	previous permit; *
BOD ₅	--- : 45	previous permit; LAG480000 – Schedule A
Oil and Grease	--- : 15	previous permit; *
Fecal Coliform		
Colonies/100 ml	--- : 400**	previous permit; LAG480000 – Schedule A
pH (standard units)	6.0 : 9.0 (min) : (max)	previous permit; *; LAG480000 – Schedule A

Treatment: septic system for sanitary discharge, no treatment for stormwater runoff or boiler blowdown

Monitoring Frequency: once per quarter per the previous permit

Limits Justification: Sanitary and boiler blowdown wastewaters are a small part of the discharge from this outfall; therefore, TSS and temperature limits were not imposed. Quarterly flow reporting is consistent with LAC 33:IX.2707.I.1.b. TOC and Oil and Grease are based on the previous permit and LDEQ stormwater guidance*. BOD₅ and Fecal Coliform are based on the previous permit and the General Permit for Light Commercial Facilities, LAG480000, Schedule A - Discharges of Treated Sanitary Wastewater (Less than 5,000 gpd). pH is based on the previous permit, LDEQ stormwater guidance*, and LAG480000, Schedule A.

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

** weekly average

2. **Outfall 002** – intermittent discharge of stormwater runoff from the west area of the site

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow – MGD	Report : Report	LAC 33:IX.2707.I.1.b
TOC	--- : 50	previous permit; *
Oil and Grease	--- : 15	previous permit; *
pH (standard units)	6.0 : 9.0 (min) : (max)	previous permit; *

Treatment: none

Monitoring Frequency: once per quarter per the previous permit

Limits Justification: Quarterly flow reporting is consistent with LAC 33:IX.2707.I.1.b. TOC, Oil and Grease, and pH are based on the previous permit and LDEQ stormwater guidance*.

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

3. **Outfall 003** – intermittent discharge of stormwater runoff from the southwest area of the site, near the rail yards

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow – MGD	Report : Report	LAC 33:IX.2707.I.1.b
BOD ₅	--- : Report	previous permit; BPJ
TOC	--- : 50	previous permit; *
Oil and Grease	--- : 15	previous permit; *
pH (standard units)	6.0 : 9.0 (min) : (max)	previous permit; *

Treatment: none

Monitoring Frequency: Flow, Oil and Grease, and pH monitoring shall be once per quarter per the previous permit. BOD₅ and TOC shall be monitored once per month due to numerous excursions from the previous permit.

Limits Justification: Quarterly flow reporting is consistent with LAC 33:IX.2707.I.1.b. TOC, Oil and Grease, and pH are based on the previous permit and LDEQ stormwater guidance*. Monitoring for BOD is not typically required for stormwater runoff. However, due to excessive exceedances at Outfall 003, a report requirement for BOD₅ will remain in the permit for this outfall based on BPJ.

- * LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

Outfall 003 no longer includes treated sanitary wastewater and area washdown. These discharges have been rerouted to Outfall 004; therefore, the Fecal Coliform parameter has been removed from this outfall.

4. **Outfall 004** – the intermittent discharge of stormwater runoff from the south area of the site; including the Fructose Trans-Loading Facility and the maintenance area, treated sanitary wastewater, and previously monitored external and internal truck washwater and area washdown

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow – MGD	Report : Report	LAC 33:IX.2707.1.1.b
TOC	--- : 50	*
BOD ₅	: 45	LAG480000-Schedule A
Oil and Grease	--- : 15	*
Fecal Coliform Colonies/100 ml	--- : 400**	LAG480000-Schedule A
Temperature, °F	--- : 100 °F	previous permit
pH (standard units)	6.0 : 9.0 (min) : (max)	*, LAG480000- Schedule A

Treatment: septic system for sanitary discharge, no treatment for interior or exterior truck washwater, area washdown, or stormwater runoff

Monitoring Frequency: once per quarter per similar outfalls

Limits Justification: TSS limits were not imposed at this outfall since the sanitary wastewater is a minor component of the flow and because the truck washwater has been previously monitored. Quarterly flow reporting is consistent with LAC 33:IX.2707.1.1.b. TOC and Oil and Grease are based on LDEQ stormwater guidance*. BOD₅ and Fecal Coliform are based on the General Permit for Light Commercial Facilities, LAG480000, Schedule A – Discharges of Treated Sanitary Wastewater (Less than 5,000 gpd). pH is based on LDEQ stormwater guidance*, and LAG480000, Schedule A.

Temperature is imposed based on the previous permit because water is heated for washing operations.

Note: In the previous permit, this outfall consisted of the discharge of external and internal truck washwater and area washdown. The discharge of treated sanitary wastewater (formerly at Outfall 003) and stormwater runoff have now been added to this outfall. Due to the fact that the truck washing operation is covered by effluent limitation guidelines for the Transportation Equipment Cleaning Point Source Category at Subpart D, Tanks Transporting Food Grade Cargos Category,

40 CFR Part 442.41, the internal and external truck washing operation will be sampled separately as internal Outfall 104.

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

** weekly average

5. **Outfall 104** – internal and external truck washwater and area washdown (estimated truck process washwater flow is 5400gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow – MGD	Report : Report	LAC 33:IX.2707.I.1.b
BOD ₅	24 : 56	40 CFR Part 442.41
TSS	45 : 120	previous permit; *, 40 CFR Part 442.41
Oil and Grease	8.8 : 20	40 CFR Part 442.41
pH (standard units)	6.0 : 9.0 (min) : (max)	previous permit; 40 CFR Part 442.41

Treatment: none

Monitoring Frequency: once per month per similar outfalls

Limits Justification: Monthly flow reporting is consistent with LAC 33:IX.2707.I.1.b. The internal and external truck washing operation at this facility is subject to Best Practicable Control Technology Currently Available (BPT) and Best Conventional Pollutant Control Technology (BCT) effluent limitation guidelines for the Transportation Equipment Cleaning Point Source Category at Subpart D, Tanks Transporting Food Grade Cargos Category, 40 CFR Part 442.41:

Regulated Parameter	Monthly Average	Daily Maximum
BOD ₅	24 mg/l	56 mg/l
TSS	86 mg/l	230 mg/l
Oil and Grease	8.8 mg/l	20 mg/l
pH	6.0	9.0
(standard units)	(min)	(max)

Site Specific Considerations

*According to LAC 33:IX.2707.L.2, “a permit may not be renewed, reissued, or modified on the basis of effluent guidelines promulgated under CWA Section 304(b) subsequent to the original issuance of such permit, to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit.” Therefore, the Monthly Average TSS limitation is based on the Weekly Average TSS from the previous permit. The Daily Maximum

TSS limit is calculated using the ratio of TSS Daily Maximum/ TSS Monthly Average from the effluent guidelines contained in 40 CFR Part 442.41. The calculations are as follows:

TSS Ratio from the guideline: $(\text{Daily Maximum } 230 \text{ mg/l}) / (\text{Monthly Average } 86 \text{ mg/l}) = 2.674$

TSS Ratio for the permit: $(\text{Daily Maximum}) / (\text{Monthly Average } 45 \text{ mg/l}) = 2.674$

TSS Daily Maximum Limitation = 120 mg/l

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Appendix A

Product List

Molasses

Liquid Calcium Chloride

Caustic - Sodium Hydroxide

White Liquor – Sodium Hydroxide, Sodium Carbonate

High Fructose Corn Syrup

MEA - Monoethanolamine

SynerMax – Liquid *Saccharopolyspora* (formerly known as *Streptomyces*) Solubles Concentrate

Mold- Zap – propionic acid, ammonium hydroxide